

REMARKS

This paper is submitted in response to the Office Action mailed February 12, 2007 in reference to the above-captioned application. Applicant respectfully requests reconsideration and withdrawal of the rejections in light of the accompanying remarks.

Claims 1, 4-9, and 13-15 are pending.

Claims 2, 3, and 10-12 are cancelled.

Claim 1 is amended herein.

Claims 7 and 14 are objected to.

Applicant acknowledges the allowable subject matter of claims 7 and 14 as indicated by the Examiner in paragraph 10 of the Office Action.

Claim 1 is amended to correct a repeated phrase and a grammatical error, both of which are self-explanatory. Thus, no new matter is added by way of this amendment.

The Substantive Rejections under 35 USC § 103

Claims 1, 4-6, 8, 9, 13 and 15 are rejected under 35 USC §103(a) as being unpatentable over JP-10-073864 issued to Nemoto in view of USPN 3,559,542 issued to Clapp in further view of USPN 5,455,711 issued to Palmer. Applicant respectfully traverses the rejection.

The Examiner states, *inter alia*, regarding claim 1, that Nemoto discloses a quick change lens mount for connecting a lens assembly to a camera board (51). However, the Examiner concedes that Nemoto does not disclose a quick connect coupling having a pair of slots to permit passage of a key and a pair of keyways extending circumferentially from ends of corresponding ones of said slots, as recited in claim 1. The Examiner further concedes that Nemoto does not disclose a removable adapter coupled to said lens assembly, where said removable adapter has a threaded interior opening to receive a threaded end of a lens housing and a base insert end, as recited in claim 1.

Additionally, the Examiner states, *inter alia*, that Clapp discloses a locking and unlocking mechanism for attachment of a lens mounting assembly 21 to a camera body 20 which ensures quick releasing and locking action of a lens (Clapp, col. 1, lines 72-col. 2, line 3). The Examiner further states that the camera body includes a seating ring 23 with a flange 23A having one or more keyway notches 26, and Clapp includes a removable adapter (lens mounting assembly 21) having a threaded interior opening (Clapp, col. 2, lines 39-42, and Figures 6 and 7). The Examiner states that the adapter 21 also has a base insert end having locating lugs 26A which project laterally from the inner or lower end of the lens housing 21 (Clapp, col. 2, lines 46-48), and a locking collar 28 is disposed within and threadingly engages with a seating ring 23 and has keyway notches 31 (Clapp, col. 2, lines 58-75). The Examiner concludes that it would have been obvious to one having ordinary skill in the art at the time the invention was made to have modified the threaded lens mount of Nemoto with the adapter having a quick release and locking mechanism as taught in Clapp.

However, the Examiner concedes that the mechanism of Clapp does not explicitly disclose keyways. The Examiner asserts, *inter alia*, that Palmer teaches that bayonet style connectors may be used with optical devices, and offers several definitions of bayonet coupling which include prongs and mating slots (Office Action, paragraph 2). The Examiner concludes that it would have been obvious to one skilled in the art at the time of the invention to modify the CCD camera of Nemoto, as modified with the adapter and quick connect mechanism of Clapp, and use a conventional bayonet fitting, as in Palmer, on the base and base insert end of the adapter to provide a quick connect fitting. Applicant disagrees.

Applicant contends that the claimed invention is nonobvious because none of the references disclose or render obvious to one skilled in the art an adapter having internal threads to connect to mating external threads in a camera body, and a base insert end having keys for engagement with keyways on a base recited in claim 1.

Claim 1 calls for:

1. A quick change lens mount for connecting a lens assembly to a camera board the camera board having an image recording device, a filter and a filter housing to position the filter over the image recording device, comprising:
 - (a) a base attached to said camera board, having a quick connect coupling for removable coupling to said lens assembly said base having an interior opening and said quick connect coupling having a pair of slots to permit passage of a key and a pair of keyways extending circumferentially from ends of corresponding ones of said slots;
 - (b) a removable adapter coupled to said lens assembly, said removable adapter having a threaded interior opening to receive a threaded end of a lens housing and a base insert end, said base insert end having keys for engagement with said keyways on said base so as to lock said lens assembly to said base

upon engagement of the keys of said removable adapter to respective ones of said keyways on said base, and;
(c) means for affixing said base, filter and filter frame to said camera board. **(underlining added)**

The Examiner concedes that Nemoto does not disclose a quick connect coupling having a pair of slots to permit passage of a key and a pair of keyways extending circumferentially from ends of corresponding ones of said slots, as recited in claim 1. The Examiner further concedes that Nemoto does not disclose a removable adapter coupled to said lens assembly, where said removable adapter has a threaded interior opening to receive a threaded end of a lens housing and a base insert end, as recited in claim 1.

The Examiner turns to Clapp to remedy the deficiencies of Nemoto. However, the collar 28 (shown in FIG. 8) disclosed in the Clapp patent has external threads not the “threaded interior opening” recited in claim 1. Further, Clapp has a lens housing 21 (FIGS. 1 and 2) having lugs which mate with keyway notches 26 (shown in FIG. 3) positioned in the camera body 20. In contrast, the claimed invention includes keys for engagement with keyways on the removable adapter. As the Examiner concedes, the mechanism of Clapp does not explicitly disclose keyways. The Examiner turns to Palmer to teach the deficiency of Clapp. Palmer merely suggest a bayonet coupling such that an interior surface 51 of a second region 40 may accept the bayonet coupling of a lens assembly (col. 5, lines 42-45; FIG. 2). However, Palmer does not depict the coupling or how it would fit together with the other disclosed elements, and therefore, would not teach or motivate one skilled in the art to make the combination the Examiner suggests.

None of the references show the adapter threads and key arrangement, nor the base having a slot and keyway arrangement as recited in claim 1. Additionally, none of the references render obvious to one skilled in the art combining the references, as the Examiner suggests, to arrive at the claimed invention. The hypothetical combination of the references as suggested by the Examiner would result in the locking collar of Clapp having external threads mating with the internal threads of the camera body, which is the opposite arrangement of the claimed adapter which is connected to a lens assembly not a camera body. A lens housing, not an adapter between a lens housing and the camera body as claimed, would use lugs to connect to a hypothetical bayonet coupling (as stated but not shown in Palmer) in the locking collar in the camera body.

None of the references disclose an adapter having internal threads to connect to mating external threads in a camera body, and a base insert end having keys for engagement with keyways on a base recited in claim 1. The thread arrangement depicted in Clapp is a locking collar having external threads that mate with internal threads in a camera body 20 which is opposite to the thread arrangement recited in claim 1, and therefore teaches away from the claimed invention. The locking collar of Clapp does not have lugs or keys at all. The lugs 26A are on a lens housing 21. Palmer does not show any of the adapter, lug, or slot arrangement recited in the claimed invention. Palmer mentions a bayonet coupling in relation to an interior surface 51 of a second region 40 accepting a bayonet coupling of a lens assembly (col. 5, lines 42-45; FIG. 2). Palmer does not disclose

an adapter having keys mating with slots in a base as recited in claim 1 of the present invention, and therefore also teaches away from the claimed invention.

Thus, Applicant believes the Examiner is using impermissible hindsight to reconstruct the Applicant's invention using knowledge which could only be gleaned from Applicant's disclosure since, for example, none of the references disclose singularly or in combination the adapter recited in the claimed invention.

Dependent claims 4, 5, 6, 7 and 8

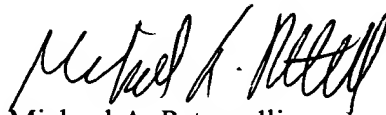
Dependent claims 4, 5, 6, 7 and 8 incorporate all of the structure of claim 1, and are believed allowable for the same reasons discussed above, as well as for the additional subject matter claimed therein.

Claims 9, 13, 14 and 15

Independent claim 9 is rejected under 35 USC §103a using the same references, and for the same reasons as claim 1. Claim 9 recites (in part) a method of mounting a lens assembly to a camera board including a removable adapter having keys which lock to a base having slots and keyways. Applicant believes the arguments above regarding claim 1 also apply to the unobviousness of claim 9, and therefore, claim 9 is also believed to be allowable. Dependent claims 13, 14 and 15 incorporate all of the limitations of independent claim 9, and therefore are also believed to be allowable.

Applicants believe that the paper submitted herein provides a complete response to the Office Action, and the present case is in condition for allowance. Therefore, in view of the foregoing, Applicants respectfully request reconsideration, withdrawal of all rejections, and allowance of all pending claims in due course. If the Examiner believes that a telephone conference with the Applicant's attorneys would be advantageous to the disposition of this case, the Examiner is requested to contact the undersigned, Applicant's attorney, at the number provided below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A. Petrocelli".

Michael A. Petrocelli
Registration No. 53,461

Scully, Scott, Murphy & Presser, P.C.
400 Garden City Plaza, Suite 300
Garden City, New York 11530
(516) 742-4343

PE/MAP:ej